

Koch, Kristine

From: Allen, Elizabeth
Sent: Tuesday, March 05, 2013 11:57 AM
To: Koch, Kristine; Humphrey, Chip
Subject: RE: Food Web Model and PRGs

Really, we were just expected to take their word on the PRGs? Values that they calculated, and then provided to us with essentially no documentation of precisely how they were calculated. Values which we then told them they could use in evaluating alternatives, which then became EPA-directed PRGs. It's clear that the FWM remains a black box, 4 years after the LWG submitted the PRG report. I find that troubling. What did they expect, that we would accept PRGs from a model, where the inputs were virtually unknown to us?

Burt's email from Feb 26 says "For what I understand Elizabeth Allen is wanting to do regarding human health PRGs, the current steady state Gobas model spreadsheet is all I need. I know there are multiple model iterations where the diet compositions of some of the modeled species were run, the final calibrated steady state model is what I would need you to point me to, or to send me the current spreadsheet on email." Unless my reading comprehension is bad, Jim's implication that a request "would be forthcoming" is a representation of a very tenuous relationship with the truth. But I've come to expect that from them. In no way has anyone asked for a "PRG tool." My own view is that the model does a very poor (read: is useless) when the sediment concentrations get pretty low, and that we'd be just as well using a simple BSAF relationship. But all that was asked for was a copy of the model they used as it was in 2009. The version used for the PRG report, not the bioaccumulation modeling report. And that alone is an example of how they've generated so much BS that they can no longer keep anything straight. So, they struggling to respond? Here's a suggestion: take the FWM as used in the PRG report. Attach it to an email. Press send.

From: Koch, Kristine
Sent: Tuesday, March 05, 2013 10:09 AM
To: Humphrey, Chip
Cc: Allen, Elizabeth
Subject: FW: Food Web Model and PRGs

So much for nimble working groups...

From: James McKenna [<mailto:jim.mckenna@verdantllc.com>]
Sent: Tuesday, March 05, 2013 9:23 AM
To: Koch, Kristine; Humphrey, Chip
Cc: Wyatt, Robert; Jennifer Woronets
Subject: FW: Food Web Model and PRGs

Kristine and Chip:

Our team is trying its best to be responsive to this request. Chip, I just tried to call you about this issue and left you a voice mail. Elizabeth states that the request was made a week ago, but there was no formal request from EPA to LWG for the FWM (Burt sent an email to John Toll last week stating this request "would be coming"). A few phone calls have been exchanged and our team has been scrambling to respond to this informal request and will do our best to get you a copy of the model by COB today.

Elizabeth stated in her email this morning that the model should have been submitted in 2009. The LWG did not get comments from EPA on the 2009 bioaccumulation modeling report and we've never been asked for additional documentation. The LWG has never previously been asked to provide the model, and we've never been asked to produce a PRG tool (i.e., a version of the model that could be used by a third party unfamiliar with the model's architecture to generate PRGs).

Per our standard operating practice, requests from EPA to the LWG should come from one of the RPMs to Bob Wyatt and me, and Jen should always be cc'd. This way we can carefully and efficiently track the request.

Thanks, Jim.

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]
Sent: Tuesday, March 05, 2013 9:09 AM
To: James McKenna; Allen, Elizabeth; Shephard, Burt
Cc: Humphrey, Chip; Jennifer Woronets; John Toll; Bob Wyatt; Koch, Kristine
Subject: RE: Food Web Model and PRGs

Jim – while I'm fine with having a discussion on the food web model and how it was set up, but we do expect that you will be providing it to us by the end of today.

Regards,
Kristine

From: James McKenna [<mailto:jim.mckenna@verdantllc.com>]
Sent: Monday, March 04, 2013 4:27 PM
To: Allen, Elizabeth; Shephard, Burt
Cc: Humphrey, Chip; Koch, Kristine; Jennifer Woronets; John Toll; Bob Wyatt
Subject: Food Web Model and PRGs

Elizabeth and Burt:

It is our understanding that you're looking for a copy of the Food Web Model so that you can generate PRGs based on the revised risk assessments. I spoke with John Toll and unfortunately this is a bit more difficult than just "handing over a model". John and I would like to talk with the two of you tomorrow morning to discuss how best to fulfill your request.

We are available tomorrow between 8:00am and 1:00pm (except 10:00 to 11:00). I think we should be able to resolve a path forward in about 30 to 60 minutes. Let us know what time works best for you and we'll have Jen set-up a conference call.

Thanks,

Jim McKenna
Verdant Solutions, LLC
5111 SE 41st Avenue
Portland, Oregon 97202
Office: (503) 477-5593
Cell: (503) 309-1621
jim.mckenna@verdantllc.com